

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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JEANETTE MATEO	:	
Plaintiff	:	
	:	Civil Action No. 02 CV 4596
v.	:	
	:	
JON M. SULLIVAN	:	
Defendant	:	

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**PLAINTIFF'S PRETRIAL MEMORANDUM**

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**PROPOSED STIPULATED FACTS**

1. On or about July 10, 2000, 2:10 p.m. Plaintiff Jeanette Mateo was a lawful passenger in a motor vehicle being operating by Gabriel Mateo traveling in a northbound direction on Route 73 in Maple Shade, New Jersey.
2. On the above referenced date and time of the accident, Plaintiff's vehicle was traveling directly behind a vehicle operated by Paul Sosnowsky, Jr.
3. On the date and time aforesaid, Defendant Jon M. Sullivan was operating a motor vehicle in a northbound direction on Route 73 in Maple Shade, New Jersey directly in front of the Sosnowsky vehicle.
4. On the date and time aforesaid, Defendant Jon M. Sullivan attempted and eventually made an illegal left hand turn and/or u-turn onto southbound Route 73 causing Plaintiff's vehicle to strike the rear of a vehicle driven by Paul Sosnowsky, Jr.
5. Although the Defendant's vehicle was not involved in said impact, Defendant was identified by Gabriel Mateo with said information supplied by the maple Shade

Police Department.

**EXHIBITS**

- P-1 Discharge report of Our Lady of Lourdes dated July 10, 2000
- P-2 Report of Dr. Neil K. Liebman dated January 28, 2002
- P-3 Review by Dr. Liebman of x-rays taken of Plaintiff on July 10, 2000
- P-4 Review by Dr. Liebman of x-rays taken of Plaintiff on July 28, 2000
- P-5 Office notes from Advanced Chiropractic
- P-6 Report of Stuart G. Dubowitch, D.O. dated November 8, 2000
- P-7 MRI report of the lumbar spine dated 11/17/00
- P-8 MRI report of the cervical spine dated 11/17/00
- P-9 Report of Shiva Gopal, M.D. dated August 29, 2000
- P-10 Report of Shiva Gopal, M.D. dated February 20, 2001
- P-11 Report of Shiva Gopal, M.D. dated April 3, 2001
- P-12 Report of Shiva Gopal, M.D. dated January 25, 2001
- P-13 Report of Barry A. Korn, D.O. dated April 4, 2001
- P-14 Report of Barry A. Korn, D.O. dated April 11, 2001
- P-15 Report of Barry A. Korn, D.O. dated March 28, 2001
- P-16 Report of Barry A. Korn, D.O. dated April 25, 2001
- P-17 Report of Barry A. Korn, D.O. dated May 17, 2001

**WITNESSES**

1. Jeannette Mateo  
9 C Adams Drive  
Maple Shade, NJ 08052

2. Gabriel Mateo  
9 C Adams Drive  
Maple Shade, NJ 08052
3. Dr. Neil K. Liebman  
2123 Browning Road  
Pennsauken, NJ 08110

4. Stuart G. Dubowitch, D.O.  
Regional Orthopedic Professional Association  
Kennedy Memorial Hospital - Cherry Hill Division  
P.O. Box 8566  
Cherry Hill, NJ 08002
5. Shiva Gopal, M.D.  
Eastern Neurodiagnostic Associates, P.C.  
West Jersey Medical and Professional Plaza  
100 Carnie Blvd., Suite A-7  
Voorhees, NJ 08043
6. Barry A. Korn, D.O.  
Center For Pain Management, P.C.  
Suite 200A  
1030 North Kings Highway  
Cherry Hill, NJ 08034
7. Jon M. Sullivan  
6327 Mifflin Avenue  
Harrisburg, PA 17111
8. Paul Sosnowsky, Jr.  
103 Cottage Avenue  
Moorestown, NJ 08057
9. Representatives of the Maple Shade Police Department

SAFFREN & WEINBERG

By: \_\_\_\_\_  
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